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9 RAMESH "SUNNY" BALWANI

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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION

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15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 v.
18 HOLMES, et al.,
19 Defendants.

Case No. 5:18-cr-00258-EJD

**STIPULATION AND [PROPOSED]
ORDER GOVERNING RAMESH
"SUNNY" BALWANI'S CASE
SCHEDULE**

Hon. Edward J. Davila

1 The government and counsel for Mr. Balwani have met and conferred and respectfully
2 submit that based on the current trial date set in Mr. Balwani's case it would be beneficial to
3 establish the dates that will govern proceedings in Mr. Balwani's case. Accordingly, the
4 government and counsel for Mr. Balwani stipulate that the attached Proposed Case Schedule shall
5 govern proceedings in Mr. Balwani's case.

IT IS SO STIPULATED.

9 || DATED: August 4, 2021

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

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/s/ Jeffrey B. Coopersmith

JEFFREY B. COOPERSMITH
Attorney for Defendant
RAMESH "SUNNY" BALWANI

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DATED: August 4, 2021

Respectfully submitted,

STEPHANIE M. HINDS
Acting United States Attorney

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/s/ Robert S. Leach

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ROBERT S. LEACH

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Assistant United St

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2 **UNITED STATES v. RAMESH "SUNNY" BALWANI**
3 **No. 18-CR-00258-EJD**
4 **[PROPOSED] CASE SCHEDULE**

DATE	EVENT
Friday, October 1, 2021	The Government shall serve a summary pursuant to Federal Rule of Criminal Procedure 16 for any expert witness it intends to call in its case-in-chief not previously noticed for the trial of co-defendant Elizabeth Holmes.
Friday, November 5, 2021	The Government shall serve any supplement to its exhibit and witness lists previously disclosed in the trial of Elizabeth Holmes.
Friday, November 12, 2021	Defendant shall serve witness and exhibit lists for his case-in-chief. Defendant shall serve a summary pursuant to Federal Rule of Criminal Procedure 16 for each expert witness Defendant intends to call at trial in Defendant's case-in-chief. Defendant shall complete production of witness statements pursuant to Rule 26.2.
Wednesday, November 17, 2021	Defendant shall complete his Rule 16 disclosures other than expert disclosures.
Friday, November 19, 2021	Motions in limine and motions re: experts due.
noon, Fri., Dec. 3, 2021	Responses to motions in limine and motions re: experts due.
noon, Fri., Dec. 10, 2021	Replies for motions in limine and motions re: experts due. Pretrial Conference statement due per Criminal Local Rule 17.1-1(b).
Friday, December 17, 2021	The Government shall serve a summary pursuant to Federal Rule of Criminal Procedure 16 for each expert witness it intends to call at trial in rebuttal to expert testimony offered by Defendant Balwani.
Tuesday, December 21, 2021	Proposed jury instructions, juror questionnaire, and voir dire questions due. The Government shall advise the Court that it has produced all Brady and Giglio information in its possession and will continue to produce any the Government subsequently discovers.
9 a.m. Tues, Dec. 14, 2021	Pretrial Conference (including hearing on motions in limine and motions re: experts).
Tuesday, January 11, 2022	Trial (first day of jury selection).

1 **[PROPOSED] ORDER**

2 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

3 The Proposed Case Schedule submitted by the government and Mr. Balwani shall govern
4 proceedings in Mr. Balwani's case, with the modifications noted above by the Court.

5 September 9

6 Dated: ~~August~~ ___, 2021



EDWARD J. DAVILA
UNITED STATES DISTRICT JUDGE

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